



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 12, 2020

By ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas St.
White Plains, New York 10601

Re: *United States v. Ford, et al.*, No. 19 Civ. 9600 (KMK)

Dear Judge Karas:

This Office represents the United States of America in the above-captioned Clean Water Act enforcement action brought against Mark Ford and his related companies (“Defendants”). Per Your Honor’s Individual Rule of Practice II.A, the United States’ deadline to respond to Defendants’ request for a pre-motion conference to discuss their anticipated post-answer Federal Rule of Civil Procedure 12(c) motion, Dkt. No. 28, is today, March 12, 2020. Because of the unanticipated absence of a key supervisor in this Office and in order to consult with the Environmental Protection Agency and the Department of Justice, Environmental and Natural Resources Division, the United States respectfully requests an extension of its time to respond, from March 12, 2020, until March 17, 2020. This is the United States’ first request for an extension of time. This morning, this Office reached out to both attorneys for Defendants to seek their consent to this request, but received no response. No deadlines are impacted by this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

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